

From: [Hebert, John](#)
To: [Benbow, Gene](#)
Subject: RE: Wilco
Date: Monday, April 29, 2013 9:33:29 AM

For the gopher product we don't need anything to be submitted. But can you please remind him that they should have efficacy data in their possession. As for the field use product....is this one where there are multiple pests (BTPD, voles, maybe commensals, etc...)? If that's the case I would think we would need something on every pest. Seems unlikely that they would do that. And to be honest....."powdered anise" as an attractant? Really? That's almost like throwing licorice down a burrow. Why would that attract anything? It would repel you, for sure.....

From: Benbow, Gene
Sent: Monday, April 29, 2013 8:53 AM
To: Hebert, John
Subject: RE: Wilco

Okay, one is a field use product (36029-10) and the other is only for gopher burrow baiting by homeowners (36029-12).

How do we handle changes to a formula when they aren't labeled for commensalis?

Gene Benbow
Biologist
Insecticides-Rodenticides Branch
<http://epa.gov/pesticides/>

From: Hebert, John
Sent: Monday, April 29, 2013 8:45 AM
To: Benbow, Gene
Subject: Re: Wilco

I'm confused....are those two numbers not his products?

From: Benbow, Gene
Sent: Monday, April 29, 2013 8:43:12 AM
To: Hebert, John
Subject: FW: Wilco

Nah – I got this one though.

Gene Benbow
Biologist
Insecticides-Rodenticides Branch
<http://epa.gov/pesticides/>

From: Hebert, John
Sent: Sunday, April 28, 2013 10:50 PM
To: Benbow, Gene
Subject: FW: Wilco

Hey Gene - surprise, this ZP question has nothing to do with fixing something DanP screwed up. Shocking..... Can you see what type of efficacy data we would need for Blake's products if they are adding this new "attractant"? I wasn't sure if he was talking about commensals or field uses. Thanks....

john

From: Blake Hazen [jbhazen@live.com]
Sent: Sunday, April 28, 2013 10:36 PM
To: Hebert, John
Subject: Re: Wilco

Hello Mr. Hebert,

36029-10 and 36029-12.

Thank you Mr. Hebert,

Blake

Sent from my Sprint phone

"Hebert, John" <Hebert.John@epa.gov> wrote:

Hi Blake - we would require some sort of efficacy study. What are the pests? Or better yet, can you give me the registration number of the product you're talking about?

john

From: Blake Hazen [jbhazen@live.com]
Sent: Sunday, April 28, 2013 9:48 PM
To: Hebert, John
Subject: Re: Wilco

Hello Mr. Hebert,

Thank you for answering me on the weekend,
I appreciate it.

As far as the attractant is concerned I would like to add Powdered anise to our zinc formulation. These products are very new to me. What would the process be? Would I have to submit it for lab testing or would it just require a change to the csf?

Thank you very much,

Blake

Sent from my Sprint phone

"Hebert, John" <Hebert.John@epa.gov> wrote:

Hi Blake -

1. If the product is RUP, there are no packaging size limitations.
2. When you say "attractant," what exactly do you mean? If you're talking about some sort of chemical pheromone, we may require it to be registered as an active ingredient. But in general there is no prohibition to adding attractants - whether they are chemical (e.g., pheromones) or simply bait/food ingredients.

Feel free to followup with me if you have other questions.

Regards,
John

From: Blake Hazen [jbhazen@live.com]
Sent: Friday, April 26, 2013 4:37 PM
To: Hebert, John
Subject: Wilco

Good afternoon Mr. Hebert,

I have a couple of questions about zinc bait.

- 1) Can restricted use ZP bait come in sizes of 1 and 5 lbs?
- 2) Is there a regulation against using an attractant with ZP bait?
I've yet to see a ZP product with an attractant.

Thank you very much for your time and thank you for all the help you have been to me and to Wilco.

Have a great weekend,

Blake